

Remarks

The present paper is in response to the Office Action dated October 5, 2007, where the Examiner has rejected claims 17 – 31. In the present amendment, claims 17, 23, 30, and 31 have been amended. New claims 32 – 37 have been added. Accordingly, claims 17 – 37 are pending in the present application with claims 17 and 32 being the independent claims. Reconsideration and allowance of pending claims 17 – 37 in view of the following remarks are respectfully requested.

35 USC §103(a)

In the Office Action, pending claims 17 – 31 stand rejected under 35 U.S.C. 103(a) as obvious with respect to U.S. Patent No. 6,684,369 (“Bernardo”) in view of U.S. Patent No. 6,606,653 (“Ackerman”). The Office Action asserts that it would have been obvious to one of ordinary skill in the art to combine the web site creation features of Bernardo with the updating of links as taught by Ackerman. This rejection is traversed as follows.

An invention is unpatentable if the differences between it and the prior art would have been obvious at the time of the invention. As stated in MPEP § 2143, there are three requirements to establish a *prima facie* case of obviousness.

First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant’s disclosure.

A. Suggestion or Motivation to Combine

In the Office Action, the cited motivation is to provide a structured way to update the URLs pointed to by embedded links in source web pages when the target pages of such links have moved and have new URLs. However, this motivation is simply just the subject matter of Ackerman. The Office Action does not cite any passage in either reference to support combining the web site creation utilities of Bernardo with the link update features of Ackerman. It is only Applicant’s disclosure that provides this connection and details the features and advantages of URL modification during the website creation and publication process.

B. Reasonable Expectation of Success

The second prong of the obviousness analysis requires that the Office Action demonstrate that the combination of the cited prior art references points to the reasonable expectation of success in arriving at the present claims. Ackerman's disclosure is directed toward post publication updating of broken links to target pages when those target pages have moved. That is not the subject matter of the present claims, as clarified by the amendment above.

C. Combined References Must Teach All Claim Limitations

With respect to the third prong of an obviousness analysis, the combination of the references does not yield all the limitations of the claimed invention. Bernardo teaches a system for creating documents from templates and content that are combined into the document that is created.

Ackerman discloses updating a broken URL when the URL is clicked and the target web page has moved. Ackerman can only function if the target web page still exists (at a different location) and if a detour page exists at the original location (as referenced by the broken link) and if the detour page has the programmed logic to query know about the URL for the different (new) location of the target web page. This disclosure in Ackerman in combination with Bernardo does not teach each and every limitation of amended claim 17.

Specifically, amended claim 17 is directed toward an entirely different problem than Ackerman. Ackerman is concerned about updating links in a source page when the target of that link moves. Claim 17 is directed toward updating links in a source page when the source page moves. Accordingly, Applicant has amended claim 17 to clarify that it is an indirect URL that is updated. Absolute URLs remain valid when the source page moves because they are absolute. Indirect links, however, are broken when the source page moves because the starting point of the URL has changed. The combination of Bernardo and Ackerman does not teach this aspect of claim 17. Accordingly, Applicant asserts that claims 17 – 31 are presently in condition for allowance and a notice of allowance is respectfully requested.

New Independent Claim 32

New independent claim 32 is directed toward an embodiment of the invention that facilitates maintaining the integrity of links in a document during the creation and publication process. For example, during the creation process content may often be moved from one document to another

document. When the relocated content was the target of a URL within the relocated content's initial document, that URL requires updating. New claim 32 addresses this problem.

The combination of Bernardo and Ackerman do not make new claim 32 obvious. Ackerman is directed toward the updating of links when external documents are moved and requires that a detour page be present and programmed with enough logic to provide the source page with the new URL for the moved page. Ackerman does not disclose or even contemplate the updating of internal links that point to content within a document. Furthermore, neither Ackerman nor Bernardo disclose updating an internal link to one of a variety of different types of relative links, as required by dependent claims 33 – 37, respectively. Accordingly, Applicant believes that new independent claim 32 and each of its dependent claims 33 – 37 are presently in condition for allowance and a notice of allowance is respectfully requested.

Conclusion

If the Examiner has any questions or comments regarding the above Remarks, or believes that a telephone conversation may be useful in advancing prosecution, the Examiner is requested to contact the undersigned at the number listed below.

Respectfully submitted,
Procopio, Cory, Hargreaves & Savitch LLP

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By: /Patricia J. Rawlins/
Patricia J. Rawlins
Reg. No. 47,887

Procopio, Cory, Hargreaves & Savitch LLP
530 B Street, Suite 2100
San Diego, California 92101-4469
(619) 238-1900